

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERICA JOHNSON,)	
)	Case No. 1:22-cv-07077
Plaintiff,)	
)	
v.)	Magistrate Judge Jeffrey Cummings
)	
VH LISLE, LLC d/b/a HYATT REGENCY,)	
)	
Defendant.)	JURY TRIAL DEMANDED

JOINT STATUS REPORT

Plaintiff, Erica Johnson (“Plaintiff”), and Defendant, VH Lisle, LLC d/b/a Hyatt Regency (“Defendant”), by and through their undersigned attorneys, hereby submit the following joint status report pursuant to this Court’s order dated January 24, 2023 [Dkt. No. 13]:

1. Basis for Jurisdiction:

Subject matter jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1331 as this lawsuit arises under the laws of the United States, including the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 *et seq.*

2. Summary of Claims:

This lawsuit arises under the Americans with Disabilities Act of 1990, as amended, (“ADA”) seeking redress for Defendant’s hostile work environment under the ADA, and also terminating Plaintiff’s employment because of their disability and in retaliation for them attempting to assert their rights under the ADA when Plaintiff reported harassment and discrimination because of their disability.

3. Relief sought:

Plaintiff seeks the following relief:

- i. Back pay with interest;
- ii. Payment of interest on all back pay recoverable;

- iii. Front pay;
- iv. Loss of benefits;
- v. Compensatory and punitive damages;
- vi. Reasonable attorneys' fees and costs;
- vii. Award pre-judgment interest if applicable; and
- viii. Award Plaintiff any and all other such relief as the Court deems just and proper.

4. Status of Pending Motions:

No motions pending at this time.

5. Proposed Discovery Schedule:

- A. Deadline for Rule 26(a)(1) disclosures:** March 14, 2023
- B. Deadline for issuing written discovery requests:** April 3, 2023
- C. Deadline for completing fact discovery:** November 3, 2023
- D. Earliest date parties available for trial:** March 1, 2024

6. E-Discovery:

The parties anticipate that discovery will encompass electronically stored information, and agree to service by electronic means.

7. Discovery Plan:

- E. Conducted:** Plaintiff served Initial Disclosures, First Request for Production of Documents, First Request for Admissions, and First Set of Interrogatories on January 24, 2023.
- F. Anticipated:** Plaintiff anticipates conducting several depositions. Defendant anticipates serving their Initial Disclosures and first written discovery requests.

8. Jury Demand:

Plaintiff has made a demand for a jury trial.

9. Status of Settlement Discussions:

- a. Settlement discussions began when Plaintiff made her initial demand on November 17, 2022.
- b. Defendant indicates that it wants to complete some initial discovery before discussing settlement.
- c. The parties do not request a settlement conference at this time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day February, 2023, a true and correct copy foregoing has been provided electronically via electronic mail and/or via U.S. mail to following:

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